

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW MEXICO

UNITED STATES OF AMERICA,

Plaintiff,

vs.

CR. NO. 20-1370 KWR

JULIAN LUCAS GARCIA, III,

Defendant.

**DEFENDANT'S RESPONSE TO THE UNITED STATES' FIRST, FOURTH, SIXTH  
AND NINTH MOTIONS IN LIMINE**

Defendant Julian Garcia, III, through his counsel of record, Robert J. Gorence of the Gorence Law Firm, LLC, hereby responds to the United States' First, Fourth, Sixth and Ninth Motions in Limine as follows:

**United States' First Motion in Limine for a Lafler-Frye Hearing**

Mr. Garcia does not oppose the request for a Lafler-Frye Hearing. However, Mr. Garcia does not believe that it is necessary for his prior attorney, Joe Romero, to appear, but obviously that is left to the discretion of the Court.

**United States' Opposed Fourth Motion in Limine for Judicial Notice**

Mr. Garcia does not oppose this Motion in Limine.

**United States' Opposed Sixth Motion in Limine for Special Procedures for the Testimony of Victim Jane Doe**

Mr. Garcia does not oppose this Motion in Limine.

**United States' Opposed Ninth Motion in Limine to Allow the Use of Transcripts and Demonstrative Aids**

Mr. Garcia does not oppose this Motion in Limine.

Respectfully submitted,

GORENCE LAW FIRM, LLC

/s/ Robert J. Gorence

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*Attorneys for Defendant Julian Garcia*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on the 16<sup>th</sup> day of August, 2021, I filed the foregoing electronically through the CM/ECF system, which caused the following parties or counsel to be served by electronic means, as more fully reflected on the Notice of Electronic Filing:

Alexander Flores, Attorney for United States  
([alexander.flores@usdoj.gov](mailto:alexander.flores@usdoj.gov))

/s/ Robert J. Gorence

Robert J. Gorence